

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: Janisia Lanice Kimbrough, Debtor

Case No. 25-00982-JAW
CHAPTER 13

**NOTICE OF FILING CHAPTER 13 PLAN AND MOTIONS FOR VALUATION AND
LIEN AVOIDANCE**

The above-named Debtor has filed a *Chapter 13 plan and Motions for Valuation and Lien Avoidance* (the “Plan”) with the Bankruptcy Court in the above referenced case (see attachment).

Any objection to confirmation of the Plan or the motions contained therein shall be filed in writing with the Clerk of Court at Thad Cochran U.S. Courthouse, 501 E. Court Street, Suite 2.300, Jackson, MS 39201, on or before June 16, 2025. Copies of the objection must be served on the Trustee, US Trustee, Debtor, and Attorney for Debtor.

Objections to confirmation will be heard and confirmation determined on June 23, 2025, at 10:00 AM in the Thad Cochran U.S. Courthouse, Bankruptcy Courtroom 4C, 501 East Court Street, Jackson, MS 39201, unless the court orders otherwise. If no objection is timely filed, the Plan may be confirmed without a hearing.

Date: April 18, 2025

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr., Attorney for Debtor

Thomas C. Rollins, Jr., MSB# 103469
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
trollins@therollinsfirm.com
601-500-5533

Fill in this information to identify your case:

Debtor 1 Janisia Lanice Kimbrough
Full Name (First, Middle, Last)

Debtor 2 _____
(Spouse, if filing) Full Name (First, Middle, Last)

United States Bankruptcy Court for the SOUTHERN DISTRICT OF MISSISSIPPI

Case number: _____
(If known)

☐ Check if this is an amended plan, and list below the sections of the plan that have been changed.

Chapter 13 Plan and Motions for Valuation and Lien Avoidance

12/17

Part 1: Notices

To Debtors: This form sets out options that may be appropriate in some cases, but the presence of an option on the form does not indicate that the option is appropriate in your circumstances or that it is permissible in your judicial district. Plans that do not comply with local rules and judicial rulings may not be confirmable. The treatment of ALL secured and priority debts must be provided for in this plan.

In the following notice to creditors, you must check each box that applies

To Creditors: Your rights may be affected by this plan. Your claim may be reduced, modified, or eliminated.

You should read this plan carefully and discuss it with your attorney if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you oppose the plan's treatment of your claim or any provision of this plan, you or your attorney must file an objection to confirmation on or before the objection deadline announced in Part 9 of the Notice of Chapter 13 Bankruptcy Case (Official Form 309I). The Bankruptcy Court may confirm this plan without further notice if no objection to confirmation is filed. See Bankruptcy Rule 3015.

The plan does not allow claims. Creditors must file a proof of claim to be paid under any plan that may be confirmed.

The following matters may be of particular importance. **Debtors must check one box on each line to state whether or not the plan includes each of the following items. If an item is checked as "Not Included" or if both boxes are checked, the provision will be ineffective if set out later in the plan.**

1.1	A limit on the amount of a secured claim, set out in Section 3.2, which may result in a partial payment or no payment at all to the secured creditor	<input checked="" type="checkbox"/> Included	<input type="checkbox"/> Not Included
1.2	Avoidance of a judicial lien or nonpossessory, nonpurchase-money security interest, set out in Section 3.4.	<input type="checkbox"/> Included	<input checked="" type="checkbox"/> Not Included
1.3	Nonstandard provisions, set out in Part 8.	<input type="checkbox"/> Included	<input checked="" type="checkbox"/> Not Included

Part 2: Plan Payments and Length of Plan**2.1 Length of Plan.**

The plan period shall be for a period of 60 months, not to be less than 36 months or less than 60 months for above median income debtor(s). If fewer than 60 months of payments are specified, additional monthly payments will be made to the extent necessary to make the payments to creditors specified in this plan.

2.2 Debtor(s) will make payments to the trustee as follows:

Debtor shall pay \$468.30 (☐ monthly, ☐ semi-monthly, ☒ weekly, or ☐ bi-weekly) to the chapter 13 trustee. Unless otherwise ordered by the court, an Order directing payment shall be issued to the debtor's employer at the following address:

General Motors
P.O. Box 62650
Phoenix AZ 85082-0000

Debtor Janisia Lanice Kimbrough

Case number _____

Joint Debtor shall pay ____ (☐ monthly, ☐ semi-monthly, ☐ weekly, or ☐ bi-weekly) to the chapter 13 trustee. Unless otherwise ordered by the court, an Order directing payment shall be issued to the joint debtor's employer at the following address:

2.3 Income tax returns/refunds.*Check all that apply*

- ☒ Debtor(s) will retain any exempt income tax refunds received during the plan term.
- ☐ Debtor(s) will supply the trustee with a copy of each income tax return filed during the plan term within 14 days of filing the return and will turn over to the trustee all non-exempt income tax refunds received during the plan term.
- ☐ Debtor(s) will treat income refunds as follows:

2.4 Additional payments.*Check one.*

- ☒ **None.** If "None" is checked, the rest of § 2.4 need not be completed or reproduced.

Part 3: Treatment of Secured Claims**3.1 Mortgages. (Except mortgages to be crammed down under 11 U.S.C. § 1322(c)(2) and identified in § 3.2 herein.).***Check all that apply.*

- ☒ **None.** If "None" is checked, the rest of § 3.1 need not be completed or reproduced.
 Insert additional claims as needed.

3.2 Motion for valuation of security, payment of fully secured claims, and modification of undersecured claims. Check one..

- ☐ **None.** If "None" is checked, the rest of § 3.2 need not be completed or reproduced.
The remainder of this paragraph will be effective only if the applicable box in Part 1 of this plan is checked.
- ☒ Pursuant to Bankruptcy Rule 3012, for purposes of 11 U.S.C. § 506(a) and § 1325(a)(5) and for purposes of determination of the amounts to be distributed to holders of secured claims, debtor(s) hereby move(s) the court to value the collateral described below at the lesser of any value set forth below or any value set forth in the proof of claim. Any objection to valuation shall be filed on or before the objection deadline announced in Part 9 of the Notice of Chapter 13 Bankruptcy Case (Official Form 309I).

The portion of any allowed claim that exceeds the amount of the secured claim will be treated as an unsecured claim under Part 5 of this plan. If the amount of a creditor's secured claim is listed below as having no value, the creditor's allowed claim will be treated in its entirety as an unsecured claim under Part 5 of this plan. Unless otherwise ordered by the court, the amount of the creditor's total claim listed on the proof of claim controls over any contrary amounts listed in this paragraph.

Name of creditor	Estimated amount of creditor's total claim #	Collateral	Value of collateral	Amount of secured claim	Interest rate*
Global Lending	\$12,232.46	2018 Chevrolet Equinox 57000 miles	\$11,785.00	\$11,785.00	10.00%

Insert additional claims as needed.

#For mobile homes and real estate identified in § 3.2: Special Claim for taxes/insurance:

Name of creditor	Collateral	Amount per month	Beginning
-NONE-			month

* Unless otherwise ordered by the court, the interest rate shall be the current Till rate in this District

Debtor Janisia Lanice Kimbrough Case number _____

For vehicles identified in § 3.2: The current mileage is _____

3.3 Secured claims excluded from 11 U.S.C. § 506.

Check one.

☒ **None.** If "None" is checked, the rest of § 3.3 need not be completed or reproduced.

3.4 Motion to avoid lien pursuant to 11 U.S.C. § 522.

Check one.

☒ **None.** If "None" is checked, the rest of § 3.4 need not be completed or reproduced.

3.5 Surrender of collateral.

Check one.

☐ **None.** If "None" is checked, the rest of § 3.5 need not be completed or reproduced.

☒ The debtor(s) elect to surrender to each creditor listed below the collateral that secures the creditor's claim. The debtor(s) request that upon confirmation of this plan the stay under 11 U.S.C. § 362(a) be terminated as to the collateral only and that the stay under § 1301 be terminated in all respects. Any allowed unsecured claim resulting from the disposition of the collateral will be treated in Part 5 below.

Name of Creditor	Collateral
Republic Finance	Household Goods
Tower Loan	Household Goods

Insert additional claims as needed.

Part 4: Treatment of Fees and Priority Claims

4.1 General

Trustee's fees and all allowed priority claims, including domestic support obligations other than those treated in § 4.5, will be paid in full without postpetition interest.

4.2 Trustee's fees

Trustee's fees are governed by statute and may change during the course of the case.

4.3 Attorney's fees.

☒ No look fee: \$4,000.00

Total attorney fee charged: \$4,000.00

Attorney fee previously paid: \$0.00

Attorney fee to be paid in plan per confirmation order: \$4,000.00

☐ Hourly fee: \$____. (Subject to approval of Fee Application.)

4.4 Priority claims other than attorney's fees and those treated in § 4.5.

Check one.

☐ **None.** If "None" is checked, the rest of § 4.4 need not be completed or reproduced.

☒ Internal Revenue Service \$45,107.27

☐ Mississippi Dept. of Revenue \$0.00

☐ Other _____ \$0.00

4.5 Domestic support obligations.

Debtor Janisia Lanice Kimbrough Case number _____

☒ **None.** If "None" is checked, the rest of § 4.5 need not be completed or reproduced.

Part 5: Treatment of Nonpriority Unsecured Claims

5.1 Nonpriority unsecured claims not separately classified.

Allowed nonpriority unsecured claims that are not separately classified will be paid, pro rata. If more than one option is checked, the option providing the largest payment will be effective. *Check all that apply.*

- ☐ The sum of \$ _____
- ☒ 100.00 % of the total amount of these claims, an estimated payment of \$ 48,081.16
- ☐ The funds remaining after disbursements have been made to all other creditors provided for in this plan.

If the estate of the debtor(s) were liquidated under chapter 7, nonpriority unsecured claims would be paid approximately **\$0.00**. Regardless of the options checked above, payments on allowed nonpriority unsecured claims will be made in at least this amount.

5.2 Other separately classified nonpriority unsecured claims (special claimants). Check one.

- ☐ **None.** If "None" is checked, the rest of § 5.2 need not be completed or reproduced.
- ☒ The nonpriority unsecured allowed claims listed below are separately classified and will be treated as follows:

Name of Creditor	Basis for separate classification and treatment	Approximate amount owed	Proposed treatment
<u>Navient</u>	<u>Student Loan</u>	<u>\$22,517.00</u>	<u>To be paid direct pursuant to contract in place with student loan provider.</u>
<u>Nelnet</u>	<u>Student Loan</u>	<u>\$11,589.00</u>	<u>To be paid direct pursuant to contract in place with student loan provider.</u>
<u>US Dept of Education</u>	<u>Student Loan</u>	<u>\$36,383.00</u>	<u>To be paid direct pursuant to contract in place with student loan provider.</u>

Insert additional claims as needed.

Part 6: Executory Contracts and Unexpired Leases

6.1 The executory contracts and unexpired leases listed below are assumed and will be treated as specified. All other executory contracts and unexpired leases are rejected. Check one.

- ☒ **None.** If "None" is checked, the rest of § 6.1 need not be completed or reproduced.

Part 7: Vesting of Property of the Estate

7.1 Property of the estate will vest in the debtor(s) upon entry of discharge.

Part 8: Nonstandard Plan Provisions

8.1 Check "None" or List Nonstandard Plan Provisions

- ☒ **None.** If "None" is checked, the rest of Part 8 need not be completed or reproduced.

Part 9: Signatures:

9.1 Signatures of Debtor(s) and Debtor(s)' Attorney

The Debtor(s) and attorney for the Debtor(s), if any, must sign below. If the Debtor(s) do not have an attorney, the Debtor(s) must provide their complete address and telephone number.

X /s/ Janisia Lanice Kimbrough X _____

Debtor	<u>Janisia Lanice Kimbrough</u>	Case number	_____
Janisia Lanice Kimbrough		Signature of Debtor 2	
Signature of Debtor 1			
Executed on	<u>April 15, 2025</u>	Executed on	_____
630 Pinebrook Place		_____	
Address		Address	
Brandon MS 39047-0000		_____	
City, State, and Zip Code		City, State, and Zip Code	
_____		_____	
Telephone Number		Telephone Number	
X	<u>/s/ Thomas C. Rollins, Jr.</u>	Date	<u>April 15, 2025</u>
	Thomas C. Rollins, Jr. 103469		
	Signature of Attorney for Debtor(s)		
	P.O. Box 13767		
	Jackson, MS 39236		
	Address, City, State, and Zip Code		
	601-500-5533	103469 MS	
	Telephone Number	MS Bar Number	
	trollins@therollinsfirm.com		
	Email Address		

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., attorney for the Debtor, do hereby certify that by filing the attached Notice and Chapter 13 Plan, I have caused the following parties to be served electronically via ECF:

Case Trustee
Office of the US Trustee

I certify that I have this day served a true and correct copy of the attached Notice and Chapter 13 Plan by US Mail¹, postage prepaid, to the following creditor(s) listed in Sections 3.2 and/or 3.4 of the Plan pursuant to Fed. R. Bankr. P. 7004:

Global Lending Services LLC
c/o Cogency Global Inc.
248 E Capitol Street, Suite 840
Jackson, MS 39201

I further certify that I have this day served a true and correct copy of the Notice and Chapter 13 Plan by US Mail, postage prepaid, to all other parties listed on the attached master mailing list (matrix).

Date: April 18, 2025

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr., Attorney for Debtor

Thomas C. Rollins, Jr., MSB# 103469
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
trollins@therollinsfirm.com
601-500-5533

¹ If the creditor is an insured depository institution, service has been made by certified mail.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

JANISIA LANICE KIMBROUGH

CASE NO: 25-00982-JAW

**DECLARATION OF MAILING
CERTIFICATE OF SERVICE**

Chapter: 13

On 4/18/2025, I did cause a copy of the following documents, described below,
Notice and Plan

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 4/18/2025

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. 103469

The Rollins Law Firm
702 W. Pine Street
Hattiesburg, MS 39401
601 500 5533
trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

JANISIA LANICE KIMBROUGH

CASE NO: 25-00982-JAW

**CERTIFICATE OF SERVICE
DECLARATION OF MAILING**

Chapter: 13

On 4/18/2025, a copy of the following documents, described below,

Notice and Plan

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 4/18/2025



Miles Wood
BK Attorney Services, LLC
d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
702 W. Pine Street
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

FIRST CLASS

GLOBAL LENDING SERVICES LLC
CO COGENCY GLOBAL INC
248 E CAPITOL ST STE 840
JACKSON MS 39201

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
NCRS ADDRESS DOWNLOAD
CASE 25-00982-JAW
SOUTHERN DISTRICT OF MISSISSIPPI
FRI APR 18 7-45-45 PST 2025

~~EXCLUDE~~

~~US BANKRUPTCY COURT
THAD COCHRAN US COURTHOUSE
501 E COURT STREET
SUITE 2300
JACKSON MS 39201 5036~~

ADVANCE AMERICA
4237B LAKE LAND DR
FLOWOOD MS 39232-9212

ADVANCE FINANCIAL
100 OCEANSIDE DRIVE
NASHVILLE TN 37204-2351

AFFIRM INC
PO BOX 720
SAN FRANCISCO CA 94104-0720

ALLSTATE
PO BOX 12055
ROANOKE VA 24022-2055

CANADA

ARROW MOUNTAIN FUNDING
PO BOX 2503
KAHNAWAKE QC

(P)ASCENDIUM EDUCATION SOLUTIONS INC
38 BUTTONWOOD COURT
MADISON WI 53718-2156

ASPIRE CREDIT CARD
PO BOX 105555
ATLANTA GA 30348-5555

AVANTWEBBANK
222 N LASALLE ST
CHICAGO IL 60601-1003

BMG MONEY
1221 BRICKELL AVE
MIAMI FL 33131-3224

BLUEFROG
1855 BOWLES AVE
FLOVILLA GA 30216

CASHCENTRALCOM
84 EAST 2400 NORTH
LOGAN UT 84341-2902

(P)CONTINENTAL FINANCE COMPANY
PO BOX 3220
BUFFALO NY 14240-3220

~~EXCLUDE~~

~~(D) (P)CONTINENTAL FINANCE COMPANY
PO BOX 3220
BUFFALO NY 14240-3220~~

CREDIT COLL
PO BOX 607
NORWOOD MA 02062-0607

CREDIT COLLECTION SERC
725 CANTON ST
NORWOOD MA 02062-2679

CREDIT ONE BANK
PO BOX 98872
LAS VEGAS NV 89193-8872

DELL FINANCIAL SERVICES
PO BOX 81607
AUSTIN TX 78708-1607

DESTINY
PO BOX 2303
COLUMBUS GA 31902-2303

(P)EARNIN
ATTN LEGAL
391 SAN ANTONIO RD 3RD FL
MOUNTAIN VIEW CA 94040-1267

EMPOWER
10700 NALL AVE
LEAWOOD KS 66211-1206

(P)EAGLE LENDING LLC DBA FINEDAY FUNI
PO BOX 457
KESHENA WI 54135-0457

FIRST PREMIER BANK
3820 N LOUISE AVE
SIOUX FALLS SD 57107-0145

GENESIS FS CARD
PO BOX 4499
BEAVERTON OR 97076-4499

GENESIS FS CARD SERVICES
PO BOX 4499
BEAVERTON OR 97076-4499

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

GLOBAL LENDING
5 CONCOURSE PKWY
ATLANTA GA 30328-7104

HOPE FEDERAL CREDIT UNION
JACKSON MED MALL
JACKSON MS 39213

INDIGO
PO BOX 205458
DALLAS TX 75320-5458

INTERNAL REVENUE SERVI
CENTRALIZED INSOLVENCY
PO BOX 7346
PHILADELPHIA PA 19101-7346

INTERNAL REVENUE SERVI
CO US ATTORNEY
501 EAST COURT ST
STE 4430
JACKSON MS 39201-5025

KIKOFF LENDING LLC
75 BROADWAY
SAN FRANCISCO CA 94111-1423

(P)KWIKCASH INC
ATTN TODD GETZ
28532 AIROSO STREET
RANCHO MISSION VIEJO CA 92694-1881

(P)TOTAL LOAN SERVICES LLC
ATTN JOHN LANGENDERFER
205 SUGAR CAMP CIRCLE
DAYTON OH 45409-1970

LENDY LLC
PO BOX 9035
DAYTON OH 45409-9035

MS TITLE LOAN
2260 HWY 80 E
STE B
PEARL MS 39208-3321

MEMBERS EXCHANGE
PO BOX 31049
JACKSON MS 39286-1049

MILESTONE
PO BOX 4499
BEAVERTON OR 97076-4499

(P)MISSION LANE LLC
PO BOX 105286
ATLANTA GA 30348-5286

NAVIENT
PO BOX 9500
WILKES BARRE PA 18773-9500

NELNET
PO BOX 82561
LINCOLN NE 68501-2561

(P)POSSIBLE FINANCIAL INC
PO BOX 98686
LAS VEGAS NV 89193-8686

PREMIER BANKCARD
PO BOX 2208
VACAVILLE CA 95696-8208

PROGRESSIVE LEASING
256 W DATA DR
DRAPER UT 84020-2315

REFLEX
PO BOX 31292
TAMPA FL 33631-3292

RENESANT BANK
9027 HWY 15 N
ACKERMAN MS 39735

(P)REPUBLIC FINANCE LLC
282 TOWER RD
PONCHATOULA LA 70454-8318

~~EXCLUDE~~

~~(D) (P)REPUBLIC FINANCE LLC
282 TOWER RD
PONCHATOULA LA 70454-8318~~

SCIL INC
15 BULL STREET SUITE 200
SAVANNAH GA 31401-2686

(P)SEZZLE INC
BANKRUPTCY DEPARTMENT
700 NICOLLET MALL
STE 640
MINNEAPOLIS MN 55402-2050

SPEEDY CASH
PO BOX 550
CLEVELAND TN 37364-0550

SPOTLOAN
PO BOX 927
PALATINE IL 60078-0927

SSTTABBANK
4315 PICKETT RD
SAINT JOSEPH MO 64503-1600

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

STATEWIDE FCU
POB 320483
FLOWOOD MS 39232-0483

SUNUPFIN
P O BOX 4356
DEPT 1557
HOUSTON TX 77210-4356

~~EXCLUDE~~

~~(D) (P) CONTINENTAL FINANCE COMPANY
PO BOX 3220
BUFFALO NY 14240-3220~~

TAB BANK
901 YAMGTO ROAD
BOCA RATON FL 33431-4497

(P) TOWER LOAN
P O BOX 320001
FLOWOOD MS 39232-0001

US ATTORNEY GENERAL
US DEPT OF JUSTICE
950 PENNSYLVANIA AVENUE
WASHINGTON DC 20530-0001

US DEPT OF EDUCATION
PO BOX 5202
GREENVILLE TX 75403-5202

US DEPT OF EDUCATION
CO US ATTORNEY
501 E COURT ST
STE 4430
JACKSON MS 39201-5025

~~EXCLUDE~~

~~UNITED STATES TRUSTEE
501 EAST COURT STREET
SUITE 6-430
JACKSON MS 39201-5022~~

~~EXCLUDE~~

~~(D) (P) CONTINENTAL FINANCE COMPANY
PO BOX 3220
BUFFALO NY 14240-3220~~

WELLS FARGO
800 WALNUT
DES MOINES IA 50309-3891

DEBTOR

JANISIA LANICE KIMBROUGH
PO BOX 321105
FLOWOOD MS 39232-1105

THOMAS CARL ROLLINS JR
THE ROLLINS LAW FIRM PLLC
PO BOX 13767
JACKSON MS 39236-3767

~~EXCLUDE~~

~~TORRI PARKER MARTIN
TORRI PARKER MARTIN CHAPTER 13
BANKRUPT
200 NORTH CONGRESS STREET STE 400
JACKSON MS 39201-1902~~